

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TN
WESTERN DIVISION

MYRON BASS

PLAINTIFF

VS

CASE No.

RECEIVED
14 OCT 29 PM 3:00
THOMAS M. GOLD
CLERK U.S. DISTRICT COURT
WD OF TN MEMPHIS

DELTA MEDICAL

HOSPITAL and

Charge Nurse TONYA

Individually & Professionally

DEFENDANTS

COMPLAINT

JURY DEMAND

NOW COMES Myron Bass, Plaintiff, and
sues the Defendants listed supra for reasons
stated below:

JURISDICTION

Jurisdiction is based on Diversity of Citizenship.
Plaintiff is a resident of the State of Arkansas,
Defendant Delta Medical Hospital is a resident
or its location is in the state of Tennessee and
Defendant Tonya is a resident of Tennessee.
The amount of controversy is over \$150,000

VENUE

Venue is pursuant to the Federal Venue Statute and the acts complained of occurred with the city of Memphis, State of Tennessee which is within the Venue of this Court.

PARTIES

1. Myron Bass, hereinafter called Plaintiff, seeks a civil remedy for actions complained herein.
2. Delta Medical Hospital is a business located at 3000 Getwell Memphis, TN and hereinafter referred to as Defendant DMH.
3. Tonya, hereinafter referred to as Defendant Tonya, is a nurse employed by Defendant DMH. Plaintiff is unaware of her surname but will obtain such during discovery. For the purpose of service of process her work address is 3000 Getwell Memphis, TN 38118

ACTS COMPLAINED OF

4. On Friday, October 2nd, 2014, Plaintiff was improperly transferred to Defendant DMH from the Veterans Hospital for medical care.
5. It is the belief of Plaintiff that Acadia now owns Defendant DMH but due to Plaintiff's limited access to research ~~actually~~ ^{NO} access to research much data must be obtained when discovery is permitted.


6. Upon arrival at Defendant DMH Plaintiff was suffering from a gout episode in his ~~left~~^{right} foot and knee, which was untreated.
7. Plaintiff's gout episode worsen and walking was extremely painful, slow and actually impossible.
8. Plaintiff requested to see a medical doctor, which was denied.
9. Plaintiff requested a wheelchair, which was denied.
10. Plaintiff had to "squat" on his buttocks to get around.
11. Plaintiff alleges that he was a victim of patient abuse when denied pain meds.
12. Defendant Tonya was in charge and denied Plaintiff's requests and actually tanted and laughed loudly at Plaintiff.
13. Plaintiff alleges that he was denied the rights and responsibilities due to him by Defendants.
14. Plaintiff alleges that Defendants are guilty of Patient Abuse.
15. Plaintiff will ~~plus~~^{MB} amend his complaint upon release ~~from~~^{MB} Defendants and has access to research unless appointed an attorney.

- Case 2:14-cv-02856-JTF-tmp Document 1 Filed 10/29/14 Page 4 of 4 PageID 4
16. Plaintiff was physically abused by a Defendant DMH through an employee.
17. Plaintiff alleges patient abuse.

Wherefore, Plaintiff prays that he is granted the following relief

1. That proper process be issued upon Defendants requiring them to Answer or otherwise plea
2. That Plaintiff be appointed an attorney to represent him during this case due to the fact he is a patient at Defendant DMH and has NO access to legal research,
3. That Plaintiff be awarded \$150,000 from each Defendant for assault as Compensatory Damages
4. That Plaintiff is awarded \$150,000 in Punitive damages
5. And all other relief that is just and necessary.

Respectfully


Myron Bass, Patient
3600 Getwell

Memphis TN 38118 Page 4 of 4